

Exhibit D

CAUSE NO. C-2917-16-B

JORGE GARCIA, Individually and on
behalf of the Estate of ABRAHAM
GARCIA, deceased, LUIS ROGELIO
PUENTE MARTELL, Individually and on
behalf of the Estate of LUIS ROGELIO
PUENTE VILLELA, deceased, OLIVIA
MIRIAM VILLELA ORTIZ, Individually,
and DANIELLA BARAJAS Individually
and on behalf of the Estate of AURELIANO
BARAJAS, ANTONIO BARAJAS,
Individually

Plaintiffs,

JEANETTA IZELA GARCIA FASSION,
INDIVIDUALLY AND AS PERSONAL
REPRESENTATIVE OF THE ESTATE OF
AURELIANO BARAJAS, DECEASED,
AND AS NEXT FRIEND OF AURELIANO
BARAJAS GARCIA, A MINOR,
INDIVIDUALLY, AND ANDRES
BARAJAS GARCIA, A MINOR,
INDIVIDUALLY,

Intervenors,

v.

LYCOMING ENGINES, A DIVISION OF
AVCO COPORATION, AND AVCO
CORPORATION; TEXTRON AVIATION,
INC., CESSNA AIRCRAFT COMPANY;
MCCREERY AVIATION COMPANY
INC.; AVIATION MANUFACTURING
COMPANY, INC. AND INTERSTATE
SOUTHWEST LTD.

Defendants,

And

WEBSTER VICKNAIR MACLEOD

Interpleading Plaintiff.

IN THE DISTRICT COURT

OF HIDALGO COUNTY, TEXAS

93RD JUDICIAL DISTRICT

DEFENDANT THE GARCIA LAW GROUP, PLLC'S ORIGINAL ANSWER

TO THE HONORABLE JUDGE OF SAID COURT:

NOW COMES **The Garcia Law Group, PLLC**, Defendant in the above-entitled and numbered cause and files this Original Answer to Plaintiff's Petition in Interpleader and Declaratory Judgment Action. In support thereof, **The Garcia Law Group, PLLC**, respectfully shows the Court the following:

I. GENERAL DENIAL

Subject to such stipulations or admissions as may hereinafter be made or filed, Defendant **The Garcia Law Group, PLLC** generally denies the allegations contained in Plaintiff's Petition in Interpleader and Declaratory Judgment Action and demands that Interpleading Plaintiff should be made to prove each allegation by a preponderance of the evidence.

WHEREFORE, PREMISES CONSIDERED, Defendant, **The Garcia Law Group, PLLC**, prays that Interpleading Plaintiff take nothing by this suit against Defendant, and that the Court grant such other and further relief, both general and special, at law and in equity to which Defendant may be justly entitled.

Respectfully submitted,

MARTINEZ REILLY, LLP

By: /s/ Mark Carrigan

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CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing document has been served upon all counsel of record in accordance with the Texas Rules of Civil Procedure on this 6th day of November, 2024.

/s/ Mark A. Carrigan

Mark A. Carrigan

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Sharon Casas on behalf of Mark Carrigan
 Bar No. 3875200
 scasas@carriganlawgroup.com
 Envelope ID: 94000680
 Filing Code Description: Answer/Response
 Filing Description: Answer/Response
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Associated Case Party: Jorge Garcia

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Marion Reilly		service@mrtrial.com	11/6/2024 2:27:16 PM	ERROR